

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
MAR 1 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Commission's Rules) ET Docket No. 98-237
With Regard to the 3650-3700 MHz)
Government Transfer Band)

REPLY COMMENTS

Sprint Corporation ("Sprint") hereby respectfully submits its reply comments on the Commission's *Notice of Proposed Rule Making and Order* ("NPRM"), FCC 98-337, released December 18, 1998 in the above-captioned proceeding.

In their comments, the satellite industry expressed their concern about the Commission's proposal to restrict the use of the 3650-3700 MHz band for Fixed Satellite Service ("FSS") by no longer accepting applications for new earth stations or major modifications to existing earth stations in this band. This band is part of the larger 3400-4200 MHz band which is allocated internationally to FSS. Comsat at 3. As GE Americom points out (at 3): "Consistent global spectrum allocations permit international satellite systems to make the most efficient possible use of frequencies. Consistent allocations also reduce the costs of building and operating satellites, including the ability of satellites to provide back-up protection to one another." Comsat notes that the proposed restrictions will be detrimental to the growth of new international services, such as IBS and Internet via satellite (at 8). Thus, as Sprint stated in its comments, this band is very important to the provision of international satellite service and its use should not be restricted.

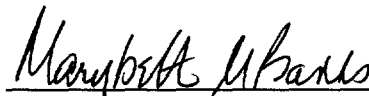
No. of Copies rec'd
List A B C D E

076

Comsearch, the firm which Sprint employs for coordination for its earth stations, filed comments which explain the current coordination process and its success in sharing the band. Comsearch states: "As evidenced by the numerous earth stations and terrestrial channel assignments coexisting over the years, mitigation techniques have been successfully employed to facilitate sharing in the C band" (at 3, fn. omitted). To demonstrate such coexistence, Comsearch provides an example of point-to-point microwave facilities within the contours of an earth station in Whitinsville, MA (at 4). If coordination is performed and incumbents notified of the deployment of new systems, the spectrum could be shared by the earth stations and new Fixed Wireless Access services (*id.*). Thus, Fixed Wireless Access services could develop in this band without imposing the restrictions on existing earth stations that the Commission has proposed.

Therefore, Sprint again urges the Commission to grandfather existing earth stations operating in the 3650-3700 MHz band and to permit applications for major modifications to the licenses in this band, as well as applications for new licenses at existing earth station sites.

Respectfully submitted,
SPRINT CORPORATION

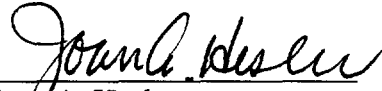


Leon M. Kestenbaum
Jay C. Keithley
Marybeth M. Banks
1850 M Street N.W., 11th Floor
Washington, DC 20036-5807
(202) 857-1030

March 1, 1999

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REPLY COMMENTS was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 1st day of March, 1999 to the below-listed parties:


Joan A. Hesler

Dale Hatfield, Chief
Engineering and Technology
Common Carrier Bureau
Federal Communications Comm.
2000 M Street, N.W., Room 480
Washington, D.C. 20554

International Transcription Service
1919 M Street, N.W.
Washington, D.C. 20036

Tom Mooring
Engineering and Technology
Common Carrier Bureau
Federal Communications Comm.
2000 M Street, N.W., Room 480
Washington, D.C. 20554

William F. Maher
Halprin, Temple, Goodman & Maher
555 12th Street, N.W.
Suite 950 North
Washington, D.C. 20004
Counsel for Northern Telecom

John G. Lamb, Jr.
Northern Telecom
2100 Lakeside Boulevard
Richardson, TX 75081

Patricia Mahoney
Clayton Mowry
Satellite Industry Association
225 Reinekers Lane, Suite 600
Alexandria, VA 22314

Robert A. Mansbach
COMSAT Corporation
6550 Rock Spring Drive
Bethesda, MD 20817

Philip V. Otero
GE American Communications
Four Research Way
Princeton, NJ 08540

Peter A. Rohrbach
Yaron Dori
Hogan & Hartson
555 Thirteenth Street, N.W.
Washington, D.C. 20004
Counsel for GE American

Andrew R. D'Uva
New Skies Satellites, N.V.
Rooseveltpantsoen 4
2517 KR – The Hague
THE NETHERLANDS

Henry Goldberg
Joseph A. Godles
W. Kenneth Ferree
Goldberg, Godles, Wiener & Wright
1229 19th Street, N.W.
Washington, D.C. 20036

Diane Law Hsu
Lucent Technologies
1825 Eye Street, N.W.
10th Floor
Washington, D.C. 20006

Thomas J. Keller
Julian Shepard
Verner Liipfert Bernhard
901 15th Street, N.W.
Suite 700
Washington, D.C. 20005
Counsel for Orion Network Systems

Daris Hastings
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004
Counsel for GE American
Communications

John Janka
Arthur S. Landerholm
Latham & Watkins
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004
Counsel for Hughes Communications

Raymond G. Bender
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036

Robert M. Lynch
Roger K. Toppins
John S. di Bene
SBC Communications
One Bell Plaza, Room 3022
Dallas, TX 75202

Philip Malet
Steptoe & Johnson
1330 Connecticut Ave., N.W.
Washington, D.C. 20006
Counsel for Comm, Inc.

David K. Moskowitz
EchoStar Satellite Corporation
90 Inverness Circle East
Englewood, CO 80112
Counsel for EchoStar

Michael Gardner
Bill Gildea
Harvey Kellman
Law Offices of Michael R. Gardner
1150 Connecticut Ave., N.W.
Washington, D.C. 20036
Counsel for VisionStar, Inc.

David G. O'Neill
Rini Coran & Lancellotta, P.C.
1350 Connecticut Ave., N.W.
Washington, D.C. 20036
Counsel for KaStar Satellite
Communications

Mike Morris
SR Telecom, Inc.
8150 Transcanada Highway
St. Laurent, Quebec
CANADA H4S 1M5

Dan Sonntag
SR Telecom, Inc.
300 South Pine Island Road
Suite 308
Plantation, FL 33324

Wayne V. Black
Peter Saari
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

Richard S. Myers
Jay N. Lazrus
Myers Keller Communications
Law Group
1522 K Street, N.W., Suite 1100
Washington, D.C. 20005
Counsel for Petroleum Communications

John A. Prendergast
Blooston, Mordkofsky.
Jackson & Dickins
2120 L Street, N.W.
Washington, D.C. 20037

L. Marie Guillory
Jill Canfield
NCTA
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

James T. Roche
GlobeCast North America Inc.
1825 K Street, N.W., Suite 1003
Washington, D.C. 20006

Norman P. Leventhal
Stephen D. Baruch
David S. Keir
Leventhal, Senter & Lerman PLLC
2000 K Street, N.W., Suite 600

Stephen M. Piper
Lockheed Martin Global
Telecommunications, Inc.
6701 Democracy Blvd., Suite 900
Bethesda, MD 20817

Gerald Musarra
Lockheed Martin Global
Telecommunications
Crystal Square 2, Suite 403
1725 Jefferson Davis Highway
Arlington, VA 22202

George Y. Wheeler
Koteen & Naftalin, LLP
1150 Connecticut Ave., N.W.
Washington, D.C. 20036

Philip L. Verveer
Stephen R. Bell
Wilkie Farr & Gallagher
1155 21st Street, N.W.
Washington, D.C. 20036
Counsel for Loral Space &
Communications Ltd.

Christopher R. Hardy
Comsearch
2002 Edmund Halley Drive
Reston, VA 20191

Doug McAlister
Airspan Communications
13455 Noel Road, Suite 1670
Dallas, TX 74240